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HONORABLE FREDERICK P. CORBIT

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON

In re

Chapter 11

1 MIN, LLC; HOTEL AT SOUTHPORT,
LLC; and TWELFTH FLOOR, LLC,

Lead Case No. 24-01519

Debtors.

LAN CAI, et al.,

Adv. Proc. No. 25-80007

Plaintiffs,

v.

NOTICE OF DEPOSITION

HOTEL AT SOUTHPORT, LLC, et al.,

Defendants,

and

WF CREL 2020 GRANTOR TRUST,

Intervenor-Defendant.

TO: DAHE ZHANG

AND TO: Matthew Livingston, Matthew Sava, and Jeremy Roller, their Attorneys

1 YOU AND EACH OF YOU WILL PLEASE TAKE NOTICE that the testimony
2 of DAHE ZHANG will be taken upon Oral Examination at the instance and request of
3 Defendants 1 Min, LLC; Hotel at Southport, LLC; Twelfth Floor, LLC; and Intervenor-
4 Defendant WF CREL 2020 Grantor Trust, on May 12, 2025, commencing in the above-
5 entitled action.

6 The deposition will be conducted at the following date, time and location:

7 **Deponent: DAHE ZHANG**

8 **Location: Seattle, Washington (exact location TBD)**

9 **Date: May 12, 2025**

10 **Time: 9:00 a.m. Pacific Time until excused (or at another time on May 12,**
11 **2025 agreed to by Defendants, Intervenor-Defendants, and counsel for**
12 **the Deponent)**

13 This deposition will be taken by stenographic and audiovisual means before an
14 official authorized to administer oaths. The deposition is subject to continuance or
15 adjournment from time to time until completed, and the scope of the deposition will
16 include but not be limited to all matters related to the deponent's claims against the
17 Defendants and Intervenor-Defendant in the above-entitled proceedings.

18 DATED this 8th day of April, 2025.

19 BUSH KORNFELD LLP

20 By /s/ Jason Wax

21 James L. Day, WSBA #20474

22 Christine M. Tobin-Presser #27628

23 Jason Wax, WSBA #41944

 Attorneys for the Reorganized Debtors